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5 *Attorneys for New Echo Entertainment, Inc.*  
6 *and Zhang Jian Hua*

7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE**  
10 **NORTHERN MARIANA ISLANDS**

11 **JIANG LI RONG**

12 **Plaintiff**

13 **v.**

14 **HONG KONG ENTERTAINMENT**  
15 **(OVERSEAS) INVESTMENT LTD, NEW**  
16 **ECHO ENTERTAINMENT, INC.,**  
17 **ALFRED YUE, ZHANG JIAN HUA,**  
18 **ZHANG DE MING, ZHANG JIAN GANG,**  
19 **LI LI, LI FENG and Does 1-10**

20 **Defendants.**

**CIVIL ACTION NO. 05-0048**

**ANSWER TO THE FIRST AMENDED  
VERIFIED COMPLAINT BY  
ZHANG JIAN HUA AND NEW ECHO  
ENTERTAINMENT, INC.**

21 Comes now Zhang Jian Hua (hereinafter "Zhang") and New Echo Entertainment, Inc. (hereinafter  
22 "New Echo") who responds to the complaint as follows:

- 23 1. Zhang and New Echo deny each and every allegation contained in ¶¶ 1, 7, 17, 18, 19, 20, 21, 24,  
24 26, 27, 29, 30, 32, 33, 34, 35, 37, 38, 39, 45, 46, 49 - 57, 64 - 67, 69 - 87, 89 - 91, 93 - 95, 97 -  
101, 103 - 111, 113 - 117, 119 - 124, 126 - 132, and 134 - 137.
- 25 2. Zhang and New Echo admits ¶ 22
- 26 3. In response to ¶ 2, Zhang and New Echo denies the existence of federal question jurisdiction as

1 to human trafficking because it is not involved in this case and 18 U.S.C. § 1595 does not apply  
2 in the Commonwealth.

3 4. In response to ¶ 3, Zhang and New Echo denies that the FLSA applies to this matter as plaintiff  
4 does not have any FLSA overtime claims.

5 5. In response to ¶ 4, Zhang and New Echo denies that the FLSA applies to this matter and further  
6 denies the existence of federal question jurisdiction based on the FLSA.

7 6. In response to ¶ 5, Zhang and New Echo denies that the FLSA applies to this matter and denies  
8 the power of this court to adjudicate any such claims.

9 7. In response to ¶ 6, Zhang and New Echo denies that the existence of supplemental jurisdiction  
10 as there is not any federal question jurisdiction. FLSA applies to this matter and denies the  
11 existence of federal question jurisdiction based on the FLSA.

12 8. In response to ¶ 8, Zhang and New Echo denies that Jiang is a victim of human trafficking.

13 9. In response to ¶ 9, Zhang and New Echo lacks personal knowledge of the incorporation of  
14 Defendant Hong Kong Entertainment (Overseas) Investment, Ltd. (hereinafter "HKE") and  
15 therefore denies ¶ 8 and further denies that Jiang is a victim of human trafficking.

16 10. In response to ¶ 10, Zhang and New Echo admits only that New Echo Entertainment, Inc., is a  
17 Commonwealth corporation. Zhang and New Echo denies all other allegations contained in ¶ 10.

18 11. In response to ¶ 11, Zhang and New Echo admit s only that Yue resides in San Jose, Tinian and  
19 that he is HKE's managing director, but lacks personal knowledge and therefore denies all other  
20 allegations contained in ¶ 11.

21 12. In response to ¶ 12, Zhang and New Echo admits only that Zhang is an individual who is a citizen  
22 of China currently residing on Saipan and is the mother of a child fathered by Yue. Zhang and  
23 New Echo denies all other allegations contained in ¶ 12.

24 13. In response to ¶¶ 13 - 16, Zhang and New Echo denies the existence of any scheme or plan

1 involving human trafficking and that plaintiff was a victim of human trafficking and that plaintiff  
2 suffered any injuries as the result of human trafficking.

3 14. In response to ¶ 23, Zhang and New Echo admits only that Zhang met plaintiff in China and  
4 denies all other allegations in ¶ 23.

5 15. In response to ¶ 25, Zhang and New Echo admits plaintiff performed housework for Zhang, but  
6 denies all other allegations contained in ¶ 25.

7 16. In response to ¶ 28, Zhang and New Echo admits only that plaintiff worked on Tinian, but lacks  
8 personal knowledge, therefore denies all other allegations contained in ¶ 28.

9 17. In response to ¶ 31, Zhang and New Echo admits only that Jiang traveled to the Commonwealth,  
10 but lacks personal knowledge therefore denies all other allegations contained in ¶ 31.

11 18. In response to ¶ 36, Zhang and New Echo admits only that Jiang assisted in caring for Yue's  
12 infant son. Zhang and New Echo denies all other allegations contained in ¶ 36.

13 19. In response to ¶ 40, Zhang and New Echo lacks personal knowledge and therefore denies all  
14 allegations contained in ¶ 40.

15 20. In response to ¶ 41, Zhang and New Echo lacks personal knowledge and therefore denies all  
16 allegations contained in ¶ 41.

17 21. In response to ¶ 42, Zhang and New Echo admits only that Yue is the father of the infant child,  
18 but denies all other allegations contained in ¶ 42.

19 22. In response to ¶ 43, Zhang and New Echo admits only that Jiang transferred to New Echo  
20 pursuant to a consensual transfer approved by the Commonwealth Department of Labor.

21 23. In response to ¶ 44, Zhang and New Echo admits that the records of the Commonwealth  
22 Department of Labor has an official copy of the transfer approval but denies all other allegation  
23 contained in ¶ 44.

24 24. In response to ¶ 47, Zhang and New Echo denies Jiang was kept in any servitude and deny the

1 alleged action took since the paragraph does not identify any action allegedly took.

2 25. In response to ¶ 48, Zhang and New Echo admits that Jiang abused Yue's infant son. Zhang and  
3 New Echo denies all other allegations contained in ¶ 48.

4 26. In response to ¶ 58, Zhang and New Echo admits only that Jiang is not fluent in English. Zhang  
5 and New Echo denies all other allegations contained in ¶ 58.

6 28. In response to ¶ 59, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 - 58  
7 of the amended complaint.

8 29. In response to ¶¶ 60 - 62, Zhang and New Echo need not respond to those paragraphs as they  
9 contain allegation of law in that they cite portions of certain federal statutes which Zhang and  
10 New Echo contend are not applicable in the Commonwealth, Nevertheless, Zhang and New Echo  
11 admit only that the text and provisions of 18 U.S.C. §§ 1589, 1590, and 1595 are set forth in the  
12 U.S. Code.

13 30. In response to ¶ 68, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 - 67  
14 of the amended complaint.

15 31. In response to ¶ 88, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 - 87  
16 of the amended complaint.

17 32. In response to ¶ 92, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 - 91  
18 of the amended complaint.

19 33. In response to ¶ 96, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 - 95  
20 of the amended complaint.

21 34. In response to ¶ 102, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 -  
22 101 of the amended complaint.

23 35. In response to ¶ 112, Zhang and New Echo reallegess and incorporate their responses to ¶¶ 1 -  
24 111 of the amended complaint.

1 36. In response to ¶ 118, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 -  
2 117 of the amended complaint.

3 37. In response to ¶ 125, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 -  
4 124 of the amended complaint.

5 38. In response to ¶ 133, Zhang and New Echo realleges and incorporates their responses to ¶¶ 1 -  
6 132 of the amended complaint.

7 **PRAYER FOR RELIEF**

8 Wherefore, Zhang and New Echo pray for relief as follows:

- 9 1. Plaintiff take nothing by her complaint;  
10 2. Cost of suit including attorneys fees; and  
11 3. Such other and further relief as the court deems just and proper.

12  
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14 Attorneys-at-Law

15  
16 By: \_\_\_\_\_/s/\_\_\_\_\_  
17 Viola Alepuyo  
18 Attorneys for Zhang, Jian Hua  
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